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*Attorneys for Defendant
Barclays Bank Delaware*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MICHELLE H. PRO,

Plaintiff,

vs.

BARCLAYS BANK, DELAWARE;
EQUIFAX INFORMATION SERVICES,
LLC; FIRST PREMIER BANK;
TRANSUNION, LLC,

Defendants.

Case No.: 2:18-cv-01454-MMD-GWF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEFENDANT
BARCLAYS BANK DELAWARE'S
TIME TO RESPOND TO COMPLAINT

(FIRST REQUEST)**

This Stipulation to Extend Time to Respond to Complaint is made by and between Plaintiff Michelle H. Pro ("Plaintiff") and Defendant Barclays Bank Delaware ("Barclays") through their respective counsel, in light of the following facts:

RECITALS

A. Plaintiff filed the Complaint ("Complaint") against Barclays on or about August 7, 2017.

B. Barclays was served with the Complaint on August 13, 2018.

C. Barclays' current deadline to respond is September 4, 2018.

D. The parties agreed to extend Barclays' time to respond to the Complaint through October 2, 2018, in order to give Barclays time to investigate Plaintiff's claims and prepare a proper response, and for the parties to discuss a potential resolution of this matter.

E. There is good cause to grant this stipulation because Barclays requires additional time to investigate Plaintiff's claims and prepare a proper response, and the parties require additional time to consider a resolution of this matter.

1 F. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and Barclays
2 respectfully request that the Court extend Barclays' time to respond to Plaintiff's Complaint
3 through October 2, 2018.

4 **STIPULATION**

5 NOW, THEREFORE, Plaintiff and Barclays hereby stipulate and agree that Barclays
6 has up to and including October 2, 2018, to file a response to Plaintiff's Complaint.

7 **IT IS SO STIPULATED**

8 DATED: August 24, 2018

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

9
10 By: /s/ J Christopher Jorgenson
11 J Christopher Jorgensen
12 Attorneys for Defendant
Barclays Bank Delaware

13 DATED: August 24, 2018

HAINES & KRIEGER, LLC

14
15 By: /s/ David H. Krieger
16 David H. Krieger
17 Attorney for Plaintiff
Michelle H. Pro

18 **ORDER**

19 **IT IS SO ORDERED**

20 George Foley Jr.

21 UNITED STATES MAGISTRATE JUDGE

22 DATED 8-28-2018